

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

IN RE:)	Chapter 11
)	
USA GYMNASTICS)	CASE NO. 1:18-09108-RLM-11
)	
Debtor.)	

MOTION TO APPEAR *PRO HAC VICE*
OF ATTORNEY HEATHER E. SIMPSON

Heather E. Simpson of Kennedys CMK LLP respectfully moves the Court for an Order granting admission *pro hac vice* for the purpose of appearing as counsel on behalf of TIG Insurance Company ("TIG") in the above styled proceedings. In support of this Motion, the applicant states:

1. As required by this Court, pursuant to S.D.Ind. L.R. B9010-2, the Affidavit of Heather E. Simpson in Support of Motion to Appear *Pro Hac Vice* is attached hereto as Exhibit 1.

2. Heather E. Simpson has certified that she is admitted to practice law and is in good standing as to all of the States/Courts in which she holds a license to practice law including the States of New Jersey and New York and the Federal District Courts of New Jersey, Eastern and Southern New York, Northern Illinois and the Third, Fourth and Eleventh Districts of the United States Courts of Appeals. (See Ex. 1).

3. Heather E. Simpson is not currently under suspension or subject to other disciplinary action with respect to the practice of law.

4. Electronic payment in the amount of One Hundred Dollars (\$100.00) has been submitted via pay.gov contemporaneously with the filing of this Motion.

WHEREFORE, the undersigned counsel respectfully requests that this Court enter an Order granting Heather E. Simpson leave to appear *pro hac vice* for purposes of both the bankruptcy and the adversarial proceedings.

Date: August 22, 2019

Respectfully submitted,

KENNEDYS CMK LLP

/s/ Heather E. Simpson

Heather E. Simpson

New Jersey Bar No. 03628-2005

120 Mountain View Blvd.

Basking Ridge, New Jersey 07920

Telephone: 908-848-1226

Facsimile: 908-848-6310

Email: heather.simpson@kennedyslaw.com

CERTIFICATE OF SERVICE

I hereby certify that on August 22, 2019, a copy of the foregoing was filed electronically. Notice of this filing will be sent to the following parties through the Court's Electronic Case Filing System. Parties may access this filing through the Court's system.

Dean Panos
Melissa M. Root
Catherline L. Steeg
JENNER & BLOCK, LLP
dpanos@jenner.com
mroot@jenner.com
csteeg@jenner.com
Counsel for Debtor

Steven A. Baldwin
Tonya J. Bond
PLEWS SHADLEY RACHER & BRAUN, LLP
1346 N. Delaware Street
Indianapolis, IN 46202
sbaldwin@psrb.com
tbond@psrb.com
Counsel for Debtor

Laura A. DuVall
Ronald J. Moore
Office of U.S. Trustee
laura.duvall@usdoj.gov
ronald.moore@usdoj.gov
Counsel for U.S. Trustee

Deborah Caruso
Meredith R. Theisen
RUBIN & LEVIN, P.C.
dcaruso@rubin-levin.net
mtheisen@rubin-levin.net
Counsel for Creditor Committee

Kenneth H. Brown
Steven W. Golden
Ilan D. Scharf
James I. Stang
PACHULSKI STANG ZIEHL & JONES, LLP
kbrown@pszjlaw.com
sgolden@pszjlaw.com
ischarf@pszjlaw.com
jstang@pszjlaw.com
Counsel for Creditor Committee